REMARKS

I. INTRODUCTION

In response to the Office Action dated July 29, 2004, please consider the following remarks. Claims 1-18 remain in the application. Entry of these amendments, and re-consideration of the application, as amended, is requested.

II. STATUS OF CLAIMS

Claims 1-18 are pending in the application.

In paragraphs (3)-(4) of the Office Action, claims 1, 4-6, 8, 11, 12, and 15-17 were rejected under 35 U.S.C. §102(e) as being anticipated by Eyer et al., U.S. Patent No. 6,401,242 (Eyer).

In paragraph (5) of the Office Action, claims 1, 8, and 12 were rejected under 35 U.S.C. §102(e) as being anticipated by Arsenault et al., U.S. Patent No. 6,658,661 (Arsenault), and these rejections are being appealed.

In paragraphs (6)-(7) of the Office Action, claims 3, 7, 10, 14, and 18 were rejected under 35 U.S.C. §103(a) as being unpatentable over Eyer.

In paragraph (8) of the Office Action, claims 2, 9, and 13 were rejected under 35 U.S.C. §103(a) as being unpatentable over Eyer in view of Bennington et al., U.S. Patent No. 6,418,556 (Bennington).

III. ISSUES PRESENTED FOR REVIEW

Whether claims 1, 4-6, 8, 11, 12, and 15-17 are patentable under 35 U.S.C. § 102(e) over U.S. Patent No. 6,401,242, issued to Eyer et al. (hereinafter, the Eyer reference) and U.S. Patent No. 6,658,661, issued to Arsenault et al. (hereinafter, the Arsenault reference).

Whether claims 2-3, 7, 9-10, 13-14, and 18 are patentable under 35 U.S.C. § 103(a) over Eyer in view of U.S. Patent No. 6,418,556, issued to Bennington et al. (hereinafter, the Bennington reference).

IV. GROUPING OF CLAIMS

The rejected claims do not stand or fall together. Each claim is independently patentable.

Separate arguments for the patentability of each claim are provided below.

V. ARGUMENTS

A. The Independent Claims Are Patentable Over The Prior Art

1. The Eyer Reference

Interactive Program Guide (IPG) data for television is delivered to integrated receiver-decoders (IRDs) in a decoder population via, for example, a satellite network. The IPG data provides scheduling information for global and local programming services which are carried via the satellite network as well as another network such as a CATV network or a terrestrial broadcast network. Each IRD is assigned to an IPG region using unit addressing. At the IRD, IPG data is filtered so that only the global data and the region-specific data for the IRD's IPG region is retained and processed by the IRD. Channel map data is also delivered to the IRDs so that bundles of IRD data can be filtered out using firmware filtering to discard program sources that are not present in the channel map. The IRD data which is retained after filtering is used to provide scheduling information via an on-screen display. A preferred source may be designated when there are duplicative channels on the different networks.

2. The Arsensault Reference

In a broadcast system such as a direct-to-home satellite system, program guide information for different time periods is transmitted on different carousels (e.g., one for 0-6 hours from current time, one for 6-24 hours, one for 24-72 hours, etc.) and broadcast on all transponders. Guide information for time periods in the near future is transmitted more frequently (i.e., less information per carousel) than guide information for later time periods. The receiving IRD sets a bit mask to indicate which carousel or carousels it requires and downloads them in serial or parallel. Updated information is never missed because it is given a bit pattern that is never screened by the mask. Further, the IRD can download the program guide information in the background (i.e., while displaying video) because it does not need to tune to a different transponder.

3. The Bennington Reference

An electronic program schedule system which includes a receiver for receiving broadcast, satellite or cablecast television programs for a plurality of television channels and a tuner for tuning a television receiver to a selected one of the plurality of channels. A data processor receives and stores in a memory television program schedule information for a plurality of television programs to appear on the plurality of television channels. A user control apparatus, such as a remote controller, is utilized by a viewer to choose user control commands and transmit signals in response to the data processor which receives the signals in response to user control commands. A television receiver is used to display the television programs and television program schedule information. A video display generator receives video control commands from the data processor and program schedule information from the memory and displays a portion of the program schedule information in overlaying relationship with a television program appearing on a television channel in at least one mode of operation of the television programming guide. The data processor controls the video display generator with video control commands, issued in response to the user control commands, to display program schedule information for any chosen one of the plurality of television programs in overlaying relationship with at least one television program then appearing on any chosen one of the plurality of channels on the television receiver.

4. Independent Claims 1, 8, and 12 are Patentable Over the Eyer Reference

The First Office Action rejected claims 1, 4-6, 8, 11, 12, and 15-17 under 35 U.S.C. §102(e) as being anticipated by Eyer et al., U.S. Patent No. 6,401,242 (Eyer). The Applicants respectfully traversed this rejection, and the Final Office Action maintained this rejection.

With Respect to Claims 1, 8, and 12: Claim 1 recites the step of:

> *receiving a first program guide information at the receiver station, the first program guide information comprising a default transmitting network identifier value uniquely identifying the service network transmitting the first program guide information;*

The First Office Action argued that the Eyer reference discloses the step of receiving a first program guide information comprising a default transmitting network identifier value uniquely identifying the service network as follows:

> Loading the IPG data into system RAM 350 is controlled by a memory manager 348 coupled to the microprocessor 170. The memory manager 348 will address the RAM 350 in a conventional manner to store the IPG data for subsequent retrieval by the microprocessor 170 and display on a monitor 195 or the like coupled to the video display generator 190. Selection of particular time slots or scheduling information is made via a user interface 172. For example, a user may request to see scheduling information for a future time period, or detailed information regarding a particular program. The user interface 172 can comprise an infrared remote control receiver coupled to input instructions to microprocessor 170 in a well known manner. (col. 9, lines 53-65)

The Applicants respectfully disagreed. Noting that nothing in the foregoing passage disclosed *"receiving first program guide information comprising a default transmitting network identifier value uniquely identifying the service network transmitting the first program guide information"* as recited in claim 1, and that the foregoing merely discloses the storage of "IPG data."

The Applicants also pointed out that the other cited passages of the Eyer reference are similarly unavailing, and in fact, teach away from the Applicants' invention. The Applicants' invention teaches ***determining a receiver station configuration***, then using a default transmitting network ***transmitted as a part of the program guide information*** to determine which program guide information is presented to the user. The Eyer reference teaches a packet stream filter 335 that discards region specific IPG data for ***regions*** other than the IPG region to which the IRD is assigned, while passing global IPG data and IPG data for the region to which the IRD is assigned:

> The packet stream demultiplexer 334 also outputs packets of the IPG data to an IPG filter 335, which discards region-specific IPG data for regions other than the IPG region to which the IRD 300 is assigned, while passing IPG data for the IPG region to which the IRD is assigned to microprocessor 170. Filtering is implemented in hardware and is based on associated IPG region identifying data which is multicast addressed to the IRD 300. The filter 335 passes all IPG data for the global programming services, as that data is broadcast-addressed, not multicast-addressed. (col. 8, lines 47-56)

The foregoing discloses a receiver filtering received IPG data, but not based on ***a default transmitting network identifier*** that is received ***with the program guide information***, as specified in claim 1.

In fact Eyer teaches that the IRD filters the data it receives using information that is separately transmitted to each IRD. This information assigns the IRD to a specific CATV network identifier and IPG region identifier, as described below:

> CATV maps may be recovered by corresponding IRDs according to the assigned CATV network identifier. The identifier may be addressed to each IRD using a unit identifier which is unique to each IRD. (col. 9, lines 6-9)

Each IRD will be assigned to a specific CATV network and IPG region by unit-addressed CATV network identifiers and IPG region identifiers, respectively. (col. 9, lines 18-20).

The dynamic RAM (DRAM) 340 of FIG. 3 may be used for buffering IPG data to be filtered, for example, by firmware or software, according to a cable system identifier (ID) which can be set, for example, by a message addressed to each specific IRD. (col. 9, lines 25-28).

Nothing above is analogous to a default transmitting network identifier transmitted with the IPG data.

The Final Office Action argues:

"The receiver "receives" program guide information including a "default transmitting network identifier value" that identifies the particular network in which the "program guide information" is associated (ex. global or local. The aforementioned "network identifier value" may further "uniquely identify the service network transmitting the first program guide information" as is the case with global programming."

In making this assertion, the Office Action relies on the following passage:

The video display generator 190 may include a video decompression processor for processing digital video data. Generally, digital video is delivered via the satellite network, while digital and/or analog video is delivered via the CATV network. Analog programming is currently most prevalent with CATV systems. Analog signal processing circuitry can be provided to process analog video signals in a known manner. Means, not shown, are also required to process the audio data, whether it be digital or analog. (col. 7, lines 57-65)

The Applicants do not understand how the foregoing passage discloses or reasonably suggests receive a default network identifier with the program guide information, as is recited in claim 1.

With respect to claim one's affirmative recitation of the step of *determining a receiver configuration*, the Office Action argues:

"The claims do not require that the "receiver station configuration" is necessarily associated with a particular embodiment of the receiver. Rather, the term is broadly construed as being any type of information that would determine what program guide information to be received (ex. the terminal is "configured to receive guide information and services from selected networks/providers).

However, this definition (which, without expressly saying so, appears to argue that the very fact that a receiver station *can* receive information inherently discloses the step of *determining a receiver station configuration*) is so broad as to read the *determining a receiver configuration* phrase out of the claim. Even using a broadest reasonable interpretation, all of the claim terms must be given consideration and meaning, and Eyer simply does not disclose an affirmative step of *determining a receiver configuration*. IPG data is either presented or not, based upon data it receives using information that is separately transmitted to each IRD. If Eyer affirmatively teaches determining a receiver configuration, the Applicants are unable to determine where such teaching is found, and how the Eyer system uses this information.

Finally, the Applicants note that Office Action's § 102 rejection appears to be logically inconsistent with it's rejection of claim 3 under 35 U.S.C. § 103. Why would one skilled in the art be motivated to perform the steps of claim 3 to determine that configuration of the receiver station if the configuration could be implied simply by receiving the information in the first place?

Claims 8 and 12 also recite the features described above, and are patentable on the same basis.

5. Independent Claims 1, 8, and 12 are Patentable over the Arsenault Reference

According to the First Office Action, the Arsenault reference discloses an embodiment which "'determines a receiver station configuration': such that receiver [36] determines the particular network group for which it is designated" as follows:

> Each object packet preferably starts with a network number that signifies a broadcast group, such as "DIRECTV.RTM. 101 degree services" or a local terrestrial DMA such as "Los Angeles, Calif.". An IRD is designed or configured to participate in one or more network groups, either by hardware design, software design or user preference. So, an IRD accepts object packets that match one of the configured network groups and rejects others. (col. 8, lines 54-61)

Of course, the foregoing teaches only that each data packet includes a network number, and that an IRD is designed or configured to accept an object packet with particular network numbers. Hence, the receiver *receives what it is configured to receive*. However, Arsenault does not disclose, the

affirmative step of *determining a receiver station configuration.* In fact, since the receiver is apparently preconfigured to accept some packets and reject others, this reference teaches away from *determining a receiver station configuration.*

The First Office Action also argued that the remainder of the features of claim 1 were recited in the Arsenault reference:

> "Subsequently, the embodiment is operable to 'receive a first program guide information at the receiver station' comprising a 'default transmitting network identifier value uniquely identifying the service network' or network number that associated with program guide object packet and 'generate'/'present' the 'first program guide' on the basis of a 'comparison' between the 'default transmitting network identifier' and that associated with the receiver configuration such that the guide data presented corresponds to the particular broadcast programming"
>
> According to the First Office Action, these features are disclosed as follows:

> The transport 60 receives the transport stream of digitized data packets containing video, audio, data, scheduling information, and other data. The digital packet information contains identifying headers as part of its overhead data. Under control of the micro-controller 58, the channel demultiplexer 62 filters out packets that are not currently of interest, and routes the data packets that are of interest through the decryption circuit 64 and, in the case of some packets, also through the access control circuits 66, 68 to their proper downstream destination. The decryption circuit 64 provides decryption for the data packets that have been encrypted. The access control circuits 66, 68 provide access control by any conventional means. For example, access control may be achieved by requiring a data packet to have a proper authorization code in order to be passed to the decryptor 64 and/or video decoder 78. The access card reader 68 can interface with an access card (not shown) that will receive the packet authorization code, determine its validity, and generate a code that confirms to the transport 60 that the subject data packet is authorized.
>
> The authorized data of interest, which now consists of the payload portions of the received data packets, are forwarded to decoder DRAM 74 for buffering and may optionally be intermediately stored in system RAM 70. The audio/video decoder 72 decodes the payloads stored in DRAM 74, as needed. The requested data is routed from the RAM 70 through the transport 60 to the audio/video decoder 72. At that time, the data is routed to the video decoder 78 (which includes display generating circuitry) and the NTSC (or other) encoder 64. The video decoder 78 reads in the compressed video data from the DRAM 74, parses it, creates quantized frequency domain coefficients, then performs an inverse quantization, inverse discrete cosine transform (DCT) and motion compensation. At this point, an image has been reconstructed in the spatial domain. This image is then stored in a frame buffer in the DRAM 74. At a later time, the image is read out of the frame buffer in DRAM 74 and passed through the display circuitry to the encoder 82. The display circuitry (located in the video decoder 78) generates the graphics that allow text such as the electronic program guide data to be displayed. The encoder 78 converts the digital video signals to analog according to the NTSC standard or to other desired output protocols (e.g., ATSC), thereby allowing video to be received by a conventional television 38 or other video output device (FIG. 1).

Illustrated in FIG. 3 is an example of an electronic program guide. Typically, channels 100 are listed in, e.g., numeric order vertically; and, times 102 are listed in chronological order horizontally. The grid boxes 104 in the body of the program guide are preferably filled with text and/or graphics representing television shows and/or other programming available at the associated time on the associated channel. (col. 6, lines 1-53)

The Applicants traversed, because nothing in the forgoing passage teaches the step of *"generating a first program guide from the first program guide information and presenting the first program guide, according to a comparison between the determined receiving station configuration and the default transmitting network identifier"*.

The Final Office Action explained further:

"As to a particular limitation/step of 'generating a first program guide from the first program guide information', as previously set forth, it is the examiner's interpretation that the reference teaches a method for 'generating a first program guide from the first program guide information and presenting the first program guide" as illustrated in Figure 3 on the basis of a 'comparison between the receiving station configuration' (ex. what network group the receiver configured to received) with the 'default transmitting network identifier' associated with the received program information (Col 8, Line 54 - Col 9, Line 23). Namely, the receiver is configured to filter distributed program data and subsequently present a program guide on the basis of a comparison or filtering process between the receiver configuration and the particularly received data."

In making this assertion, the Final Office Action relies on the following text:

Each object packet preferably starts with a network number that signifies a broadcast group, such as "DIRECTV.RTM. 101 degree services" or a local terrestrial DMA such as "Los Angeles, Calif.". An IRD is designed or configured to participate in one or more network groups, either by hardware design, software design or user preference. So, an IRD accepts object packets that match one of the configured network groups and rejects others.

An IRD desires program guide coverage of a particular time window either by hardware design, software design, or user preference. For example, an IRD may only have enough RAM to support a one week guide or the IRD S/W may only support a one week guide regardless of the amount of physical RAM present, or the user might specify interest in only a one week guide regardless of the IRD's native capabilities. After the time coverage desire is determined, one or more carousels overlay the desired time window and the IRD attempts to acquire those carousels and not any other carousels.

Each object packet preferably starts with a number identifying a network (e.g., ESPN), and a carousel mask. Preferably, each network is divided into the same number of carousels with the same time coverage divisions. Further, each carousel is preferably assigned a bit flag in the carousel mask. For example, 2.sup.0 for time from 0 to 6 hours, 2.sup.1 for time from 6 to 24 hours, 2.sup.2 for time from 24 to 72 hours, and 2.sup.3 for time from 72 to 168 hours. An IRD sets a local bit mask flag(s) corresponding to the carousel(s) it requires, and performs a logical operation using the local bit mask and each incoming carousel mask to determine which objects to save. For example, if an IRD requires carousels 0, 1, and 2, it would set the 2.sup.0 bit, 2.sup.1 bit, and the 2.sup.2 bit. The IRD could acquire the three carousels in series by sequencing through the bits; the IRD could acquire the three carousels in parallel by setting all there bits two at a time; or the IRD could perform some combination of serial and parallel as resources dictated (e.g., set n bits at a time, where n>2, because that's as fast as it can handle storing the objects). (col. 8, line 54 - col. 9 line 23)

First, the "network number" in the Arsenault appears to refer to the network transmitting the *programs*, not the *program guide information* described in claim 1. As is apparent from reading the Applicants' specification, the two are not the same. In fact, as described below the Applicants invention is designed to solve the problems inherent with the Arsenault references.

In recent years, there has been an increasing demand for video distribution systems to provide more program channels. In digital satellite systems, this may be accomplished in many ways. One way of increasing the number of available channels is to increase the compression or decrease the error correction provided in the broadcast signal of existing satellites. Another way of increasing the number of available channels is to increase the bandwidth of the downlink from the satellite to the subscribers' receivers. Unfortunately, this technique is difficult to accomplish with existing (legacy) satellites and in a way that is compatible with existing (legacy) receivers.

As a result, video distribution systems have evolved to include additional satellites to broadcast additional program material to subscribers. Typically, satellites broadcasting these enhanced services are deployed in geosynchronous orbits in orbital locations proximate to those of the legacy satellites. This allows a single antenna to receive signals from both satellites with little or no physical scanning.

Electronic program guides for television programming are known in the art. Such program guides typically include a viewer channel number that identifies the stream of television content offered by a content provider and a description of each media program associated with the channel number. Program guide information is typically transmitted along with the television content, and typically also includes schedule information for display on users' televisions. The schedule information informs users what television programs are currently on, and what television programs will be shown in the near future.

Providing electronic program guides for the additional viewer channels carried by the multiple satellite video distribution system has become problematic. Typically, each satellite used in such systems transmits program guide information describing only those viewer channels carried by the satellite, and do so at regular and frequent intervals (e.g. every 5 seconds). This allows a new subscriber to receive program guide information for the satellite they are tuned to within a short period of time after setting up and activating the receiver station. However this has its disadvantages. Most notably, in multiple-satellite video distribution systems, when the subscriber requests program guide information regarding a viewer channel broadcast by a different satellite than the currently tuned viewer channel, the subscriber can experience a delay of several seconds before the program guide information is displayed.

For example, the system disclosed in U.S. Patent Nos. 5,550,576 and 5,923,362, which are hereby incorporated by reference herein, disclose a system wherein a coordinator at the subscriber location collects program guide information from a number of sources and sorts and merges the program guide information into a single guide. However this solution requires multiple tuners to simultaneously receive program guide information from two separate satellites or the above-described delay will result when switching from one program source to another.

It is possible to simply repeat the program guide information from all satellites on one channel. Such a system is described in U.S. Patent No. 6,072,983, which is hereby incorporated by reference herein. However, the system described in the '983 patent either requires additional downlink bandwidth or must extend the period of time between program guide updates. It also may presents program guide information about viewer channels which should not be received by subscribers with legacy receivers. For such subscribers, the numerous additional viewer channels can become a nuisance, since they take up space on the program guide presented to the subscriber and serve no useful purpose. (Specification, page 2, line 6 - page 3, line 22)

The foregoing passage of the Arsenault reference refers to IRDs that are designed to receive signals according to a network number and ignores all of the rest. The remainder of the passage refers only to program guide design as it refers to coverage within a time window. Nothing fairly teaches determining a receiver configuration, receiving program guide information having a default transmitting network identifier uniquely identifying the service network transmitting the first program guide information, nor generating the first program guide according to a comparison between the determined receiver station configuration and the default transmitting network identifier. In particular, a *default transmitting network identifier* (as distinguished from a *transmitting network identifier* described in claim 6) is not disclosed

B. The Dependent Claims Are Patentable Over The Prior Art

1. Dependent Claims 2-7, 9-11, and 13-18 are Patentable

With Respect to Claims 2, 9, and 13: Claim 2 recites:

The method of Claim 1, wherein the step of determining the receiving station configuration comprises the steps of:

presenting a plurality of configurations to the subscriber;

accepting a selection of configurations from among the plurality of presented configurations; and

determining the receiving station configuration according to the selected configuration.

The First Office Action acknowledges that the foregoing features are not fairly taught by the Eyer reference, but indicates that they are taught by Eyer in view of Bennington. According to the Office Action, Eyer discloses that discarded IPG data may correspond to programming services that are unavailable to the IRD due to operator preference *"wherein the particular "receiving station configuration" is "determined" on the basis of that configuration"* as follows:

> The discarded IPG data may correspond to programming services which are not available to the IRD, for example due to operator preference or limited channel capacity. (col. 9, lines 29-32)

> Trickle_Multicast 16_Address_Base=<Hex Integer>;/* e.g., 0x8800*/
> An IPG region is a collection, for the purpose of IPG delivery, of program sources shared by one or more channel line-ups. The IPG data for the sources in a given region will be pre-linked into one data block bundle and delivered to the cable system(s) in the assigned region only.
>
> An IPGT configuration parameter is defined below for this purpose. Note that only the regional sources, those tagged with a FALSE National flag in the Source_Channel_Map, will be included in the Regional_Map, and that a single regional source may belong to multiple regions. The following syntax may be used. (col. 16, line 66 - col. 17, line 14)

Apparently arguing that the foregoing teaches determining a receiver station configuration, the Office Action then argues that the motivation for doing so is to provide a means by which a user may subscribe to premium services on an impulse or on-demand basis:

> There is also a need for an electronic guide system providing the user with comprehensive information about pay-per-view events, premium services or other packaged programming to which the user does not ordinarily subscribe, and which avoids the user with the capability to automatically purchase such programming on demand or impulse. (col. 3, lines 53-67)

While the foregoing excerpt of the Eyer reference may disclose that the disclosed IPG data may correspond to programming services that are unavailable to the IRD, and an "IPGT configuration," nothing discloses any notion of a "receiver station configuration" (an IPGT is an "IPG translator", and is not analogous to a "receiving station"). Indeed, as described earlier, the Eyer reference does not rely on a determination of a "receiving station configuration" to determine which data to present to the user ... it uses the IPG region instead (see col. 8, lines 52-56). Further, the motivation cited by the Office Action ("providing a means by which a user may advantageously subscribe to premium services on an impulse or on-demand basis") does not teach different system

configurations. Premium services can be (and are) typically provided by request, not by selecting or changing a receiver station configuration. For all of these reasons, the rejection of claim 2 is respectfully traversed.

Claims 9 and 13 recite the features of claim 2 and are patentable on the same basis.

With Respect to Claim 3, 7, 10, 14, and 18: Claims 3, 7, 10, 14, and 18 recite the features of claims 1, 8, and 12, respectively, and are patentable on the same basis. Claims 3, 7, 10, 14, and 18 also recite additional features rendering them even more remote from the Eyer reference. For example, with respect to claim 3, while the Office Action acknowledges that the Eyer reference does not disclose "determining a number of converters and determining the receiver station configuration according to the number of converters," but argues that it would have been obvious to one of ordinary skill in the art to "determine the number of converters in a configuration such that as employed by Eyer for the purpose of determining which program services (ex. channels) are capable of being supported by the IRD. For example, an embodiment with a single converter may only be operable of [sic] receiving /supporting a first set of channels."

As described above with respect to claim 1, Eyer does not disclose determining a "configuration" at all, merely it's location in a region. Further, the Eyer system determines which programs to present by use of the IPG region identifying data multicast addressed to the IRD (see col. 8, lines 52-56), there is no motivation whatsoever for the IRD to determine it's configuration. Accordingly, the rejection of claim 3 is respectfully traversed.

Claims 10 and 14 recite features analogous to those of claim 3 and are patentable on the same basis.

With Respect to Claims 4-6, 11, and 15-17: Claims 4-6, 8, and 15-17 recite the features of claims 1, 8, and 15-17, respectively, and are patentable on the same basis. Claims 4-6, 8, and 15-17 also recite features rendering them even more remote from the cited references. For example, Claim 4 recites:

> *The method of Claim 1, wherein the step of determining a receiving station configuration comprises the steps of:*
>
> *receiving a message from the broadcasting system indicating the receiving station configuration.*

According to the Office Actions, this feature is disclosed in the Eyer reference as follows:

The dynamic RAM (DRAM) 340 of FIG. 3 may be used for buffering IPG data to be filtered, for example, in firmware or software, according to a cable system identifier (ID) which can be set, for example, by a message addressed to each specific IRD. (col. 9, lines 23-28)

Region assignments can be made at the time of the installation of the IRD, or later updated, for example, using a smart card which is mailed to each user. (col. 22, lines 24-26).

The foregoing passages define two items, a cable system identifier, and a region assignment. Although the Office Action indicates that both of these items are analogous to a message indicating a receiving station configuration, plainly, this cannot be the case, as they are different items. In fact, neither of these data items is analogous to a system configuration. The "cable system identifier" plainly is not, and the "region assignment" is not either. Consider, for example, the case where a particular system is moved from one region to another. The region assignment would presumably change, but the configuration would not. The analysis of claims 11 and 15 is analogous.

VI. CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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